

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	Case No. 3:15-CR-148
vs.	:	
	:	
WILLIAM M. APOSTELOS,	:	Judge Thomas Rose
	:	
Defendant.	:	

UNOPPOSED MOTION TO MODIFY BOND

Now comes the Defendant, WILLIAM M. APOSTELOS, by and through undersigned counsel, and hereby respectfully moves this Honorable Court for an Order modifying the conditions of bond, to allow Mr. Apostelos to move from his current residence to another residence, located here in Dayton, Ohio. Mr. Apostelos requests the move so that he can assist his niece with child care. His niece is a single mother of three children, who just had a baby, and has been in and out of the hospital for the past few weeks. The residence is known to U.S. Pretrial Services, and is a suitable residence for Mr. Apostelos.

Assistant United States Attorney Brent Tabacchi and United States Pretrial Officer Kelvin
Gover have no objection to this request.

Respectfully submitted,

DEBORAH L. WILLIAMS,
FEDERAL PUBLIC DEFENDER

s/F. Arthur Mullins
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Brent Tabacchi, Assistant United States Attorney, by electronic mail on the date same was filed.

s/F. Arthur Mullins
F. Arthur Mullins

Attorney for Defendant
William M. Apostelos